

## **EXHIBIT 258**

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 CASE NO. 22-CV-10904

5 -----X  
6 GOVERNMENT OF THE UNITED STATES V.I.,

7  
8 Plaintiff,

9  
10 vs.

11  
12 JPMORGAN CHASE BANK, N.A.,

13  
14 Defendant.

15 -----X  
16 \*\*\*CONFIDENTIAL\*\*\*

17 July 7, 2023

18  
19 Confidential Remote Video-Recorded

20 30(b)(6) Deposition of  
21 GVI BY JEAN-PIERRE ORIOL

22  
23 Stenographically Reported By:

24 Mark Richman, CSR, CCR, RPR, CM

25 Job No. J9913116

1 JP ORIOL - 7.7.23 - CONFIDENTIAL  
2 there had been a search party led by  
3 defendant Epstein and he was physically  
4 restraining individuals on his island,  
5 but there was no investigation opened by  
6 the VIPD, correct?

7 MR. ACKERMAN: Objection, form,  
8 scope.

9 A. Correct.

10 MR. O'LAUGHLIN: Let's enter tabs  
11 8 and 8A as exhibits 4 and 5.

12 (Exhibit 4, document, Bates  
13 VI-JPM-000079660 was marked for  
14 identification.)

15 (Exhibit 5, document, Bates  
16 VI-JPM-000079661 was marked for  
17 identification.)

18 A. Okay.

19 Q. So exhibit 4 is a message from  
20 Jason Marsh dated December 82018 to a  
21 JADA615@hotmail.com and it attaches  
22 exhibit 5 which is a, appears to be a  
23 scan of the Virgin Islands Daily News  
24 paper from December 8, 2018. Is that  
25 correct?

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2 A. So there is no way for me to tell  
3 from the exhibit 4 what is attached.

4 Q. Sure. But do you see the Bates  
5 number at the bottom 79660?

6 A. Yes.

7 Q. And then the next page is 79661,  
8 so they're sequentially Bated?

9 A. I have 79662 as the -- I'm sorry,  
10 I wasn't on the cover page of the Daily  
11 News article. Okay, yes.

12 Q. Okay. So obviously you don't  
13 have access to metadata, but do you have  
14 any reason to think that these weren't  
15 produced side by side as the attachment  
16 in the prior email?

17 A. No.

18 Q. Okay. Who is Jason Marsh?

19 A. He works in the VIPD.

20 Q. Do you know what his specific  
21 role within VIPD is?

22 A. I do not know his present title.

23 Q. Okay. If I represent to you that  
24 he is Deputy Commissioner, do you have  
25 any reason to think that's not accurate?

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2 A. No, that could be it.

3 Q. Okay. Did you speak with Mr.  
4 Marsh in preparing to testify today?

5 A. No, I did not.

6 Q. Do you know if Lieutenant  
7 Cannonier did?

8 A. No, I do not.

9 Q. No, you don't know whether she  
10 did or not or no you don't think she  
11 did?

12 A. No, I do not know if she spoke  
13 with him.

14 Q. Okay. So the news article that  
15 Deputy Commissioner Marsh sends, if you  
16 look at the second page of the PDF has  
17 the title Lawmakers issue call for  
18 investigation of Epstein deal and it is  
19 a republication of a Miami Herald piece.

20 Do you see that?

21 MR. ACKERMAN: Object to form.

22 Mischaracterizes the document  
23 entirely.

24 A. Yes, I see the article.

25 Q. Do you see it's by a Julie Brown?

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VI-JPM-000079601 was marked for  
identification.)

A. Okay.

Q. This is an email chain that  
starts with a July 16, 2019 email from a  
Curt Devine of CNN.com and it asks  
certain questions of the VI Police  
Department including "Has US Virgin  
Islands Police Department participated  
in (or been asked to participate in) any  
investigation related to Mr. Jeffrey  
Epstein?"

Do you see that?

A. Yes.

Q. Do you know what the answer to  
that question is?

A. Has the US Virgin Islands Police  
Department received any complaints? So,  
again, from what was reported to me,  
that there were no complaints.

Q. Sorry, I was focused on the  
second question which is has US Virgin  
Islands police participated in or been  
asked to participate in any

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2 investigation related to Mr. Jeffrey

3 Epstein?

4 A. So what -- from -- so staff did

5 not report to me that any invest- --

6 that they were asked to participate in

7 any investigation.

8 Q. So in addition to not having any

9 investigation of their own, they didn't

10 participate in any investigation?

11 A. Again, I don't know that there

12 was, if they were asked to. Staff did

13 not report to me that they were asked to

14 participate in.

15 Q. Okay. Do you know if there was a

16 response by VIPD to these inquiries?

17 MR. ACKERMAN: Objection, form,

18 scope.

19 A. No, I do not know.

20 Q. Okay. Let's enter tab 17 as

21 exhibit 8.

22 (Exhibit 8, document, Bates

23 VI-JPM-000084037 was marked for

24 identification.)

25 A. Okay.